

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TOBIAS MOELLER-BERTRAM, Individually and  
On Behalf of All Others Similarly Situated,

*Plaintiff,*

v.

GEMINI TRUST COMPANY, LLC, and DIGITAL  
CURRENCY GROUP, INC.,

*Defendants.*

No. 23-cv-2027

Hon. Lewis J. Liman

**NOTICE OF MOTION TO COMPEL ARBITRATION**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and the Declaration of Travis Freeman, dated March 15, 2023, with exhibits, Defendant Gemini Trust Company, LLC, by counsel, will move the United States District Court, Southern District of New York, at such time and place as the Court designates, before the Honorable Lewis J. Liman, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15C, New York, NY 10007, for an order compelling Plaintiff Tobias Moeller-Bertram to arbitrate his claims against Defendant, and for any further relief that the Court may deem just and proper.

Dated: New York, New York  
March 16, 2023

JFB LEGAL, PLLC

By /s/ John F. Baughman

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Company, LLC*